

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth.**

ORDER GRANTING FOUR HUNDRED THIRTY-THIRD OMNIBUS OBJECTION (NON-
SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS
ASSERTED AGAINST THE INCORRECT DEBTOR

Upon the *Four Hundred Thirty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Subsequently Amended Claims* [ECF No. 20489] (the “Four Hundred Thirty-Third Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (“Commonwealth”), dated April 1, 2022, for entry of an order reclassifying certain claims filed against the Commonwealth, as more fully set forth in the Four Hundred Thirty-Third Omnibus

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Thirty-Third Omnibus Objection.

Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Thirty-Third Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Thirty-Third Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Asserted” in Exhibit A to the Four Hundred Thirty-Third Omnibus Objection having improperly identified the Commonwealth as obligor, when such claims are properly asserted, if at all, against the Puerto Rico Highways and Transportation Authority (“HTA”), as identified in the column titled “Corrected” in Exhibit A to the Four Hundred Thirty-Third Omnibus Objection; and the Court having determined that the relief sought in the Four Hundred Thirty-Third Omnibus Objection is in the best interest of the Commonwealth and its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Thirty-Third Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Thirty-Third Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the claims identified in the column titled “Asserted” in Exhibit A to the Four Hundred Thirty-Third Omnibus Objection (the “Reclassified Claims”) are hereby reclassified to be claims asserted against the Title III debtor(s) indicated in the column titled “Corrected” in Exhibit A; and it is further

ORDERED that the Debtors’ right to object to the Reclassified Claims is reserved; and it is further

ORDERED that Kroll is authorized and directed, in the official claims register in the PROMESA cases, to move the claims identified in the column titled “Asserted” in Exhibit A to the Four Hundred Thirty-Third Omnibus Objection from the Commonwealth’s Title III Case (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481) to HTA’s Title III Case (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808) identified in the column titled “Corrected” in Exhibit A to the Four Hundred Thirty-Third Omnibus Objection; and it is further

ORDERED that this Order resolves Docket Entry No. 20489 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Thirty-Third Omnibus Objection

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Four Hundred Thirty-Third Omnibus Objection

Exhibit A - Claims to Be Reclassified

NAME	CLAIM#	ASSERTED			CORRECTED		
		DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1 COLON CRUZ, JOSE PO BOX 40177 SAN JUAN, PR 00940-0177	32443	Commonwealth of Puerto Rico	Unsecured	\$17,500.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$17,500.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
2 DIAZ QUIRINDONGO, ORLANDO PO BOX 40177 SAN JUAN, PR 00940-0177	71158	Commonwealth of Puerto Rico	Unsecured	\$14,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$14,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
3 DIAZ RODRIGUEZ, GABRIEL 274 URUGUAY ST. COND TORRE ALTA PH 1 SAN JUAN, PR 00917	31772	Commonwealth of Puerto Rico	Unsecured	Undetermined*	Puerto Rico Highways and Transportation Authority	Unsecured	Undetermined*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
4 FLORES MIRANDA, EDWIN PO BOX 40177 SAN JUAN, PR 00940-0177	66027	Commonwealth of Puerto Rico	Unsecured	\$14,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$14,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
5 MELENDEZ MALDONADO, GRISEL E. PO BOX 40177 SAN JUAN, PR 00940-0177	46945	Commonwealth of Puerto Rico	Unsecured	\$18,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$18,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
6 PEREZ GUILLERMET, IRMA PO BOX 40177 SAN JUAN, PR 00940-0177	47094	Commonwealth of Puerto Rico	Unsecured	\$18,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$18,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
7 PICART MONTERO, GINO B. PO BOX 40177 SAN JUAN, PR 00940-0177	41291	Commonwealth of Puerto Rico	Unsecured	\$18,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$18,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							

* Indicates claim contains unliquidated and/or undetermined amounts

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Four Hundred Thirty-Third Omnibus Objection

Exhibit A - Claims to Be Reclassified

NAME	CLAIM#	ASSERTED			CORRECTED		
		DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
8 RICO ROLON, ZAIDA PEDRO ORTIZ ALVAREZ LLC CESAR ENRIQUE MOLINA PO BOX 9009 PONCE, PR 00732	15025	Commonwealth of Puerto Rico	Unsecured	\$10,711.00	Puerto Rico Highways and Transportation Authority	Unsecured	\$10,711.00
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
9 RIVERA ALVAREZ, CRUZ CALLE LATIMER #1409 SAN JUAN, PR 00940	38684	Commonwealth of Puerto Rico	Unsecured	Undetermined*	Puerto Rico Highways and Transportation Authority	Unsecured	Undetermined*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
10 RIVERA COLLAZO, HAYDEE PO BOX 40177 SAN JUAN, PR 00940-0177	66029	Commonwealth of Puerto Rico	Unsecured	\$72,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$72,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
11 RIVERA SANATA, CARMEN PO BOX 40177 SAN JUAN, PR 00940-0177	47177	Commonwealth of Puerto Rico	Unsecured	\$18,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$18,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
12 ROSADO SANTIAGO, WILLIAM PO BOX 40177 SAN JUAN, PR 00940-0177	62224	Commonwealth of Puerto Rico	Unsecured	\$1,000,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$1,000,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
13 RUIZ RUIZ, ARNALDO PO BOX 40177 SAN JUAN, PR 00940-0177	31369	Commonwealth of Puerto Rico	Unsecured	\$18,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$18,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
14 RUIZ-ALVAREZ, JORGE A. PO BOX 40177 SAN JUAN, PR 00940-0177	34057	Commonwealth of Puerto Rico	Unsecured	Undetermined*	Puerto Rico Highways and Transportation Authority	Unsecured	Undetermined*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							

* Indicates claim contains unliquidated and/or undetermined amounts

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Four Hundred Thirty-Third Omnibus Objection

Exhibit A - Claims to Be Reclassified

NAME	CLAIM#	ASSERTED			CORRECTED		
		DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
15 RUIZ-ALVAREZ, JORGE A. PO BOX 40177 SAN JUAN, PR 00940-0177	47083	Commonwealth of Puerto Rico	Unsecured	Undetermined*	Puerto Rico Highways and Transportation Authority	Unsecured	Undetermined*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
16 SAN MIGUEL, ENRIQUE ROSSY PO BOX 40177 SAN JUAN, PR 00940-0177	46906	Commonwealth of Puerto Rico	Unsecured	Undetermined*	Puerto Rico Highways and Transportation Authority	Unsecured	Undetermined*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
17 SANTIAGO ADORNO, BLANCA I. PO BOX 40177 SAN JUAN, PR 00940-0177	47250	Commonwealth of Puerto Rico	Unsecured	\$18,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$18,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
18 SANTIAGO RODRIGUEZ, MYRNA L. PO BOX 40177 SAN JUAN, PR 00940-0177	47429	Commonwealth of Puerto Rico	Unsecured	\$18,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$18,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
19 STELLA DIAZ, HIRAM A. PO BOX 40177 SAN JUAN, PR 00940-0177	34161	Commonwealth of Puerto Rico	Unsecured	\$18,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$18,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
20 STELLA DIAZ, HIRAM A. PO BOX 40177 SAN JUAN, PR 00940-0177	66117	Commonwealth of Puerto Rico	Unsecured	\$34,380.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$34,380.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							
21 VAZQUEZ RIVERA, CARLOS I HC 73 BOX 4715 NARANJITO, PR 00719	3007	Commonwealth of Puerto Rico	Unsecured	Undetermined*	Puerto Rico Highways and Transportation Authority	Unsecured	Undetermined*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.							

* Indicates claim contains unliquidated and/or undetermined amounts

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Four Hundred Thirty-Third Omnibus Objection

Exhibit A - Claims to Be Reclassified

		ASSERTED			CORRECTED			
NAME	CLAIM#	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT	
22	VEGA GUTIERREZ, HAROLD PO BOX 40177 SAN JUAN, PR 00940-0177	41413	Commonwealth of Puerto Rico	Unsecured	\$18,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$18,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.								
23	ZAPATA RIVERA, SYLKIA PO BOX 40177 SAN JUAN, PR 00940-0177	47261	Commonwealth of Puerto Rico	Unsecured	\$18,000.00*	Puerto Rico Highways and Transportation Authority	Unsecured	\$18,000.00*
Reason: Claimant identifies obligor as the Commonwealth of Puerto Rico when the proof of claim and supporting documentation, show that any liability would reside, if at all, under the Puerto Rico Highways and Transportation Authority.								
		TOTAL		\$ 1,342,591.00*	TOTAL		\$ 1,342,591.00*	

* Indicates claim contains unliquidated and/or undetermined amounts